

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

Case No. 13-53846

Chapter 9

CITY OF DETROIT, MICHIGAN,

Hon. Steven W. Rhodes

Debtor.

**VERIFIED STATEMENT OF DYKEMA GOSSETT PLLC
PURSUANT TO FED. R. BANKR. P. 2019**

Dykema Gossett PLLC (“Dykema”) makes the following verified statement pursuant to Federal Rule of Bankruptcy Procedure 2019:

1. Dykema represent the following parties in the above captioned bankruptcy case:
 - (a) City of Detroit Downtown Development Authority (“DDA”), 500 Griswold Street, Suite 2200, Detroit, Michigan 48226-4402, is a creditor in this case, and holds claims against the Debtor relating to, upon information and belief, a loan in the approximate amount of \$33.6 million dollars and is an interested party that does with business with the Debtor.
 - (b) Health Alliance Plan (“HAP”), 2850 W. Grand Blvd., Detroit, MI 48202, is a creditor in this case, and holds claims against the Debtor for delinquent and current obligations for health plans.
 - (c) Detroit Economic Growth Corporation (“DEGC”), 500 Griswold St., Ste. 2200, Detroit, MI, 48226, is an interested party that does business with the Debtor and may also have claims against the Debtor.

- (d) Economic Development Corporation of the City of Detroit (“EDC”), 500 Griswold St., Ste. 2200, Detroit, MI, 48226, is a creditor in this case and, upon information and belief, holds claims against the Debtor in the approximate amount of \$14.5 million dollars and is an interested party that does with business with the Debtor.
- (e) City of Detroit Brownfield Redevelopment Authority (“BRA”), 500 Griswold St., Ste. 2200, Detroit, MI, 48226, is an interested party that does business with the Debtor and may also have claims against the Debtor.
- (f) Detroit Water and Sewerage Department (“DWSD”), 735 Randolph, Fifth Floor, Detroit, Michigan 48226, is a department of the Debtor.
- (g) Barclays Capital Inc., 745 Seventh Avenue, New York, New York 10019, is in negotiations with the Debtor regarding credit to be extended by Barclays to the Debtor (“DIP Financing”).
- (h) Michigan Innocence Clinic, University of Michigan Law, 701 S. State Street, Ann Arbor, MI 48109, is an interested party in this case, as it relates to a pending lawsuit titled, *Michigan Innocence Clinic v. City of Detroit Police Department*, Washtenaw County Circuit Court Case 13-396-CZ.
- (i) Ian Mobley, Paul Kaiser, Angie Wong, James Washington, Nathaniel Price, Stephanie Hollander, Jason Leverette-Saunders, Darlene Hellenberg, Kimberly Mobley, Jerome Pierce, Wanda Leverette, and Laura Malher, American Civil Liberties Union of Michigan, 2966

Woodward Avenue, Detroit, MI 48201, are interested parties in this case as it relates to a pending lawsuit titled, *Ian Mobley et al v. City of Michigan et al*, Sixth Circuit Court of Appeals, Case No. 12-2674.

2. The above-mentioned parties comprise the “Clients.”
3. Dykema is representing the Clients individually; the Clients do not comprise a committee of any kind.
4. Dykema has a Legal Services Contract with the City of Detroit, by and through the DWSD, for legal services to be performed on behalf of the DWSD. Dykema has no written contract or representation with any other Client except for ordinary and usual retainer/engagement letters, which are protected by attorney-client privilege.
5. Subject to continued investigation, and reserving all rights, Dykema believes it is a holder of a prepetition unsecured claim against the City of Detroit in the approximate amount of \$18,465.94.
6. Dykema and the undersigned reserve the right to supplement or amend this Verified Statement at any time for any reason.
7. I, Sherrie Farrell, an attorney with Dykema, verify that the above-stated information is true and correct to the best of my knowledge and belief.

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ Sherrie L. Farrell
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CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys on that system.

Respectfully submitted,

DYKEMA GOSSETT PLLC

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Dated: November 5, 2013